TSD File Inventory Index

Date: December 1, 2006

Initial: C Valenzano

Facility Name: IMCD Recycling of Illinois, Inc. (One Folder / Site)

Facility Identification Number: ILD005144233

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Note: Transmittal Letter to Be Included with Reports.
Comments: On filter site.

A.1 Public Participation

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HR-JCK-13

COLUMBIA TOOL STEEL CO
ATTN: ENVIRONMENTAL COORDINATOR
400 E LINCOLN HWY
CHICAGO HTS IL 60411

RE: ILD005144233 171476

400 E LINCOLN HWY
CHICAGO HEIGHTS IL 60411

Dear Illinois Hazardous Waste Handler:

Our records indicate that you have not yet submitted a response to the 1989 Waste Minimization Report package sent to you earlier this year.

Under the provisions of 40 CFR 262.41, 264.75 and 265.75 of the Resource Conservation and Recovery Act, you were required to submit your 1989 Waste Minimization Reports by March 1, 1990. If a site-specific extension was requested the due date would have been extended to no later than April 15, 1990. You must complete and submit your Waste Minimization Report to the address specified below.

Call (312) 886-4001 if you did not receive the above-specified package or if you have any questions.

U.S. EPA Region V
RCRA Activities
P.O. Box A-3587
Chicago, IL 60690

Sincerely yours,

Judy Kertcher

Judy Kertcher
Acting Associate Director, Office of RCRA
Waste Management Division

A.2 Part A/
Interim Status

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
RCRA ACTIVITIES

R-4 MAR 1987

Attn: William Innes, Engineer
Columbia Tool Steele Co
400 E. Lincoln Hwy
Chicago Heights, IL 60411

RE: EPA ID #: ILD005144233

In response to your request of February 11, 1987 the following information has been updated:

Please see attached notification, highlighted areas.

If you have any questions, please contact Sharon Kidder at (312) 886-6173

Sincerely,

Arthur Kawatachi

Arthur S. Kawatachi
Information Unit
Program Management Section

cc: State Agency
File

COLUMBIA
TOOL STEEL COMPANY
MAIN OFFICE AND WORKS • CHICAGO HEIGHTS, IL 60411
312/757-5353 TELEX 25-6163

ILD005 144 233
G, TSD, motj, PAS 1

August 8, 1983

United States Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

Attn: Mr. Karl J. Klepitsch

Dear Sir:

By means of this letter, Columbia Tool Steel Company is requesting that our interim permit, USEPA ID No. ILD-005-144-233, as a waste management facility be withdrawn and that Columbia Tool Steel Company will only be regarded as a hazardous waste genator and not a treatment, storage and disposal facility. We do have a permit as a generator at this time, but because of all the legal and financial requirements that need to be met in order to have a permit as a storage facility we find that it is not feasible at this time to remain a temporary storage facility.

If you, or one of your people, would contact my office so that we can discuss what steps must be taken to facilitate this cancellation of our interim permit, I will do everything that is required to expedite this withdrawal.

Thank you for your help in this matter. I will be waiting to hear from you in the near future as to what information is required from us to cancel the permit.

Very truly yours,

Bryan L. Boettger

Bryan L. Boettger
Manager-Operations

BLB:apr

cc: Mr. Andrew Vollmer
Illinois EPA
Division of Land Pollution Control
2200 Churchill Rd.
Springfield, Illinois 62706

RECEIVED
8/11/83

RECEIVED
AUG 10 1983
WASTE MANAGEMENT
BRANCH

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAR 16 1982

Bryan Boettger
400 E. Lincoln Highway
Chicago Heights, IL 60411

RE: Interim Status Acknowledgement USEPA ID No. ILD 005 144 233
FACILITY NAME: Columbia Tool Steel Company

Dear Mr. Boettger:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

DH
3/16/82

Enclosure

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

For Official Use Only

Comments: C C

Installation's EPA ID Number: C F — T/A C 1

Approved

Date Received *(yr. mo. day)*

I. Name of Installation

C 1: COLUMBIA TOOL STEEL CO

II. Installation Mailing Address

Street or P.O. Box — C 3: 400 E LINCOLN HWY

City or Town — C 4: CHICAGO HEIGHTS

State — C 4: IL

ZIP Code — C 4: 60411

III. Location of Installation

Street or Route Number — C 5: 400 E LINCOLN HWY

City or Town — C 6: CHICAGO HEIGHTS

State — C 6: IL

ZIP Code — C 6: 60411

IV. Installation Contact

Name and Title *(last, first, and job title)* — C 2: INNES WILLIAM ENG

Phone Number *(area code and number)*: 312 757 5353

V. Ownership

A. Name of Installation's Legal Owner — C R: COLUMBIA TOOL STEEL

B. Type of Ownership *(enter code)*: P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On-site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED JAN 30 1987

RECEIVED FEB 11 1987 IEPA-DLPC

SWD - AIS US EPA REGION V

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: ILD005144233

ID — For Official Use Only			
C W		T/A	C 1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K061					
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
William E. Innes	William E. Innes Plant Engineer	1/28/87

PAF

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • ILD005144233 REACKNOWLEDGEMENT

COLUMBIA TOOL STEEL COMPANY
400 E LINCOLN HWY
CHICAGO HTS IL 60411

INSTALLATION ADDRESS ➤ 400 E LINCOLN HWY
CHICAGO HTS IL 60411

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: ILD005144233

I. NAME OF INSTALLATION:

II. INSTALLATION MAILING ADDRESS:
COLUMBIA TOOL STEEL COMPANY*
400 E LINCOLN HWY
CHICAGO HTS, IL 60411

000061 AUG 18 80

III. LOCATION OF INSTALLATION:
400 E LINCOLN HWY
CHICAGO HTS, IL 60411

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F ILD005144233 T/A 8 C 1 — APPROVED: A — DATE RECEIVED (yr., mo., & day): 800815

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3

CITY OR TOWN: 4 — ST. — ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 BOETTGER BRYAN PLANT ENGINEER

PHONE NO. *(area code & no.)*: 312-757-5353

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 COLUMBIA TOOL STEEL COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If it's not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD005144233

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 15 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S														T/A	C
W	1	L	D	0	0	5	1	4	4	2	3	3		2	1
1	2											13		14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 1					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [X] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Russell H. Boettger	Russell H. Boettger, President	8/13/80

EPA Form 8700-12 (6-80) REVERSE

DETACH

DETACH

0310450014
Cook-Co Gen Corr

IMCO RECYCLING INC.

February 4, 1999

ILD005144233

Donna Keppler
Illinois Environmental Protection Agency
PO Box 19276
Springfield, IL 62794

Re: Columbia Aluminum, Inc. (Metal Mark, Inc.) name change to IMCO Recycling of Illinois Inc.
Illinois EPA ID No. 0310450014

Dear Ms. Keppler:

Please be advised that Columbia Aluminum, Inc., a division of Metal Mark, Inc., located in Chicago Heights, Illinois, (Illinois Generator ID number 0310450014) has had a name change to IMCO Recycling of Illinois Inc. The company, IMCO Recycling of Illinois Inc., also owns a facility in Miner, Missouri. IMCO Recycling of Illinois Inc. is a wholly owned subsidiary of IMCO Recycling Inc., whose corporate office is located at 5215 No. O'Connor Blvd., Irving, Texas 75039.

If you have any questions, please call me at (972) 401-7393 or Larry Lipa at (708) 758-8888. Thank you.

Sincerely,

Steven K. Curreri
Manager, Corporate Environmental Affairs

INACTIVE #

cc: L. Lipa - Chicago Heights

C. Klemme 3/30/99

Central Tower at Williams Square ♦ 5215 North O'Connor Blvd., Suite 940 ♦ Irving, Texas 75039 ♦ (214) 869-6575 ♦ Fax (214) 869-6556

5HW-12

MAR - 7 1984

Russell H. Boettger, President
Columbia Tool Steel Company
400 East Lincoln Highway
Chicago Heights, Illinois 60411

Re: Columbia Tool Steel Company
ILD 005144233

Dear Mr. Boettger:

The United States Environmental Protection Agency has reviewed your request to withdraw your Part A hazardous waste permit application. On the basis of the information you provided, we determined that your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265 (or 35 Illinois Administrative Code Section 725). Therefore, a closure plan must be submitted directly to Mr. Larry Eastep, Permit Section, Division of Land Pollution Control, Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. Requirements for closure are found at 35 Illinois Administrative Code 725. Questions on closure should be directed to Illinois EPA at the above address.

Sincerely yours,

Horst Witschonke, Chief
State Technical Unit #1

cc: Mr. Larry Eastep, IEPA
Mr. Bill Radlinski, IEPA

5HW:B.STONE:ad 3/6/84 Disk #1

	TYPIST	AUTHOR	STU #1 CHIEF	~~STU #2 CHIEF~~	~~STU # CHIEF~~	WMB CHIEF	WMB DIRECTOR
INITIALS	A.T.						
DATE	3-6-84	3/6/84	3/6/84				

COLUMBIA
TOOL STEEL COMPANY
Executive Department
CHICAGO HEIGHTS, IL 60411

February 22, 1984

United States Environmental Protection Agency
RCRA Activities
Region V
P. O. Box A3587
Chicago, IL

Attention: Mr. Karl J. Klepitsch

Re: Permit Application Withdrawal Letter
Facility Name: Columbia Tool Steel Company
U.S. EPA/ID No.: ILD 005 144 233 G, TSD, PA-9

Dear Sir:

Per your letter of January 26, 1984, Columbia Tool Steel Company is by means of this letter, resubmitting our request for withdrawal of our Hazardous Waste Permit Application as a treatment, storage or disposal facility. This request is now signed and certified by an authorized person. As stated in our letter of August 8, 1983, Columbia Tool Steel is, and has a permit to be, a hazardous waste generator. We are not asking for any action on this permit. We are asking for withdrawal of our permit application as a treatment, storage and disposal facility.

In your letter you asked for a detailed explanation why the permit application is being withdrawn. As we stated in our August 8, 1983 letter, we are withdrawing this permit application because of legal and financial requirements that need to be met in order to have a permanent permit. We were told by the Illinois EPA that we had to have a $2,000,000 bond to guarantee cleanup of this facility should we ever close down. This is a ludricrous requirement when we could close this facility down for as little as $500 total. You must understand that the only reason we requested this permit is because this hazardous waste accumulates over 90 days. We have sealed containers that collect this dust and, periodically, we must dump the dust. We just store the dust temporarily at this site. We are not a permanent disposal, treatment or storage facility. We understand now that this material cannot accumulate on our property for more than 90 days, but it is less expensive for us to dump this material every 90 days than to secure a bond and have all the permits, annual reports, etc. that are needed to have a disposal permit. Hopefully, this will clarify the request.

In terms of a closure plan, our closure plan would involve calling Browning-Ferris Industries into our plant to dispose of all waste that has

accumulated over 90 days in our sealed containers. This can be done with a phone call. We will then put their collection on a 90 day schedule.

Hopefully, this will answer all of your questions and meet your requirements so that we can withdraw the permit application. Again, thank you for your cooperation in this matter and we will be waiting to hear from your office.

Very truly yours,

Russell H. Boettger
President

RHB:apr

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

17

REPLY TO ATTENTION OF:
5HW-13

JAN 27 1984

Bryan L. Boettger, Manager-Operations
Columbia Tool Steel Company
400 East Lincoln Highway
Chicago Heights, IL 60411

RE: Permit Application Withdrawal Letter
FACILITY NAME: Columbia Tool Steel Company
U.S. EPA ID NO.: ILD 005 144 233

Dear Mr. Boettger:

This is to acknowledge receipt of your letter of August 8, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on thi. matter.

cc: R. H. Boettger, President

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

"Send enclosure for Storage ≤ 90 days"

Call facility

OK
DH
11/22/83

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-12

NOV 2 9 1983

Dr. Howard A. Spalt, Vice President
Masonite Corporation, Research Center
Powis Road
P.O. Box 808
St. Charles, IL 60174-0808

Russell H. Boettger, PRESIDENT
Columbia Tool Steel Company
400 EAST LINCOLN HIGHWAY
CHICAGO HEIGHTS, IL 60411

Re: ~~Masonite Corporation, Research Center~~ COLUMBIA TOOL STEEL COMPANY
~~ILD025821513~~
ILD 005 144 233

~~Dear Dr. Spalt:~~ MR. Boettger,

The United States Environmental Protection Agency has reviewed your request to withdraw your Part A hazardous waste permit application. On the basis of the information you provided, we determined that your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265 (or 35 Illinois Administrative Code Section 725). Therefore, a closure plan must be submitted directly to Mr. Larry Eastep, Permit Section, Division of Land Pollution Control, Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. Requirements for closure are found at 35 Illinois Administrative Code 725. Questions on closure should be directed to Illinois EPA at the above address.

Sincerely yours,

Horst Witschonke

Horst Witschonke, Chief
State Technical Unit #1

cc: Mr. Larry Eastep, IEPA
Mr. Bill Radlinski, IEPA

3-2-84
Horst: I received this file from Lisa Kerard. I recommend we send the above letter. RG Stone

11-29-83

rint or type in the unshaded areas only
—areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

421

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

S F | I L D 0 0 5 1 4 4 2 3 3 | T/A 3 | C D

1 2 - 13 14 15

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER	ILD005144233
III. FACILITY NAME	COLUMBIA TOOL STEEL COMPANY**
V. FACILITY MAILING ADDRESS	400 E LINCOLN HWY CHICAGO HTS. IL 60411
VI. FACILITY LOCATION	400 E LINCOLN HWY CHICAGO HTS. IL 60411

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

C 1 SKIP

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
C 2 BOETTGER BRYAN PLANT ENGINEER	312 757 5353

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3

B. CITY OR TOWN | C. STATE | D. ZIP CODE

C 4

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5

B. COUNTY NAME

COOK COUNTY

C. CITY OR TOWN | D. STATE | E. ZIP CODE | F. COUNTY CODE *(if known)*

C 6 | | | 031

EPA Form 3510-1 (6-80)

NOV 11 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3312 (specify) Electric Furnace, Hot Forming, Rolling	3325 (specify) Tool Steel Foundry

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: COLUMBIA TOOL STEEL COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 312 757 5353

E. STREET OR P.O. BOX: 400 E LINCOLN HIGHWAY

F. CITY OR TOWN: CHICAGO HEIGHTS

G. STATE: IL

H. ZIP CODE: 60411

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N IL0046612	9 P NA

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U NA	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R ~~ILD005144233~~	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

We manufacture tool steel bar products and castings. Facilities include: 1) 2 - Electric Arc furnaces, 2) Induction furnace, 3) 5 - Steam/Air Hammers, 4) 2 - Rolling Mills (9" & 14"), 5) 6 - Electric Annealers, 2 - Gas Annealers, 1 - Radiant Annealer, 6) Inspection & Cold Finishing facilities, 7) Warehouse, 8) Met & Chem Lab, and 9) Main Offices.

F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
R. H. Boettger, President	R H Boettger	11-11-80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	I	L	D	0	0	5	1	4	4	2	3	3	3	1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	C/2

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (71)

[ ] 2. NEW FACILITY *(Complete item below.)* (71)

C	YR.	MO.	DAY
8	7 3	1 2	3 1
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C	D	U	P										3	1
1	2											13	14	15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	5858000 29 000	G Y	
2				
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing i[illegible] have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY														
S W	I	L	D	0	0	5	1	4	4	2	3	3	T/A 3	C 1	S W	D	U	P							T/A 3	C 2	DUP	
1 2												13	14	15	1 2									13	14	15	23 - 26	

421

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
1	K 0 6 1	42 000	T	S 0 1	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
25					
26					
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F I L D 0 0 5 1 4 4 2 3 3 T/A 3 C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6:A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6:B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 30 22	087 36 ~~05~~ 580

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
R. H. Boettger, President	R H Boettger	11-11-80

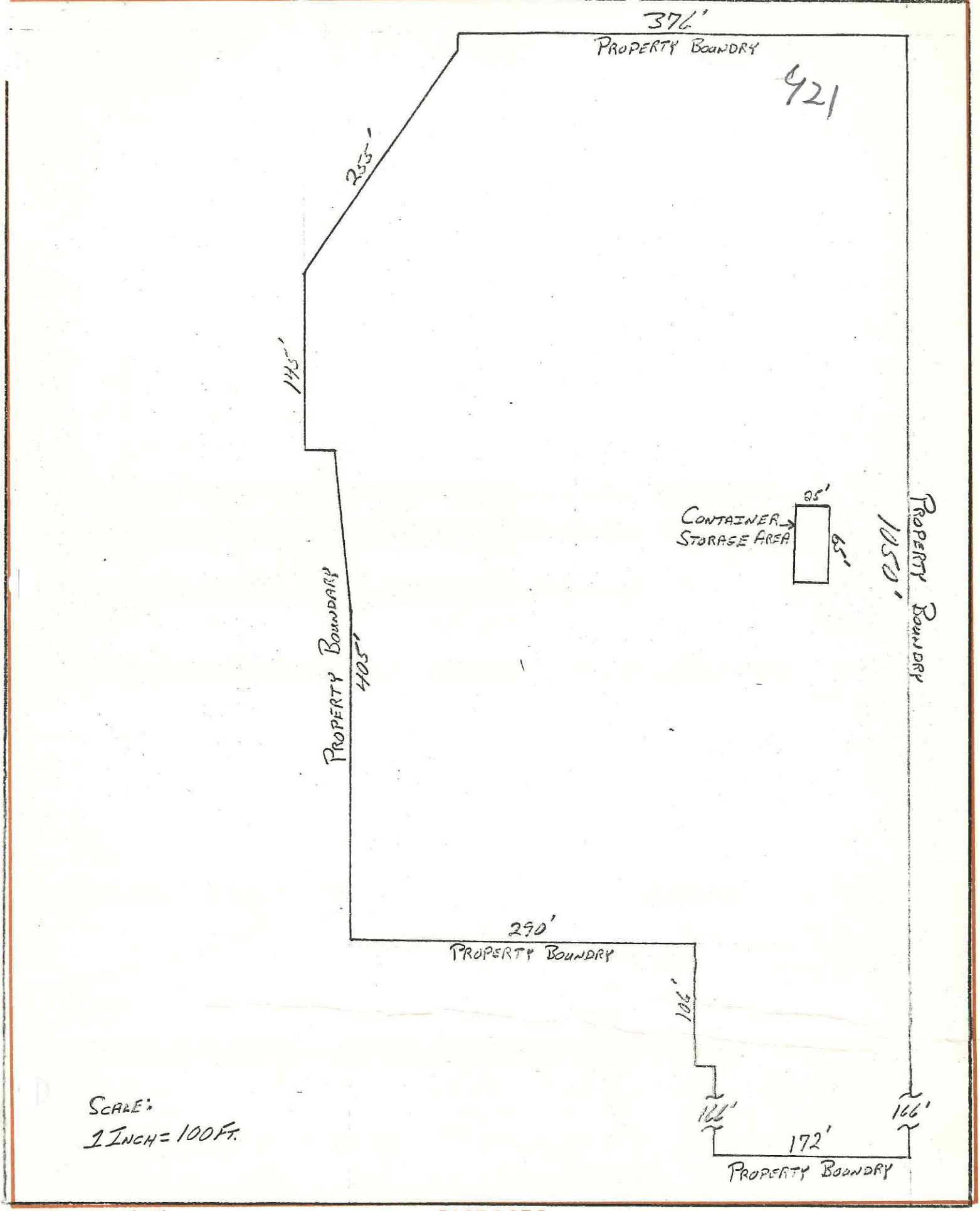
X. OPERATOR CERTIFICATION

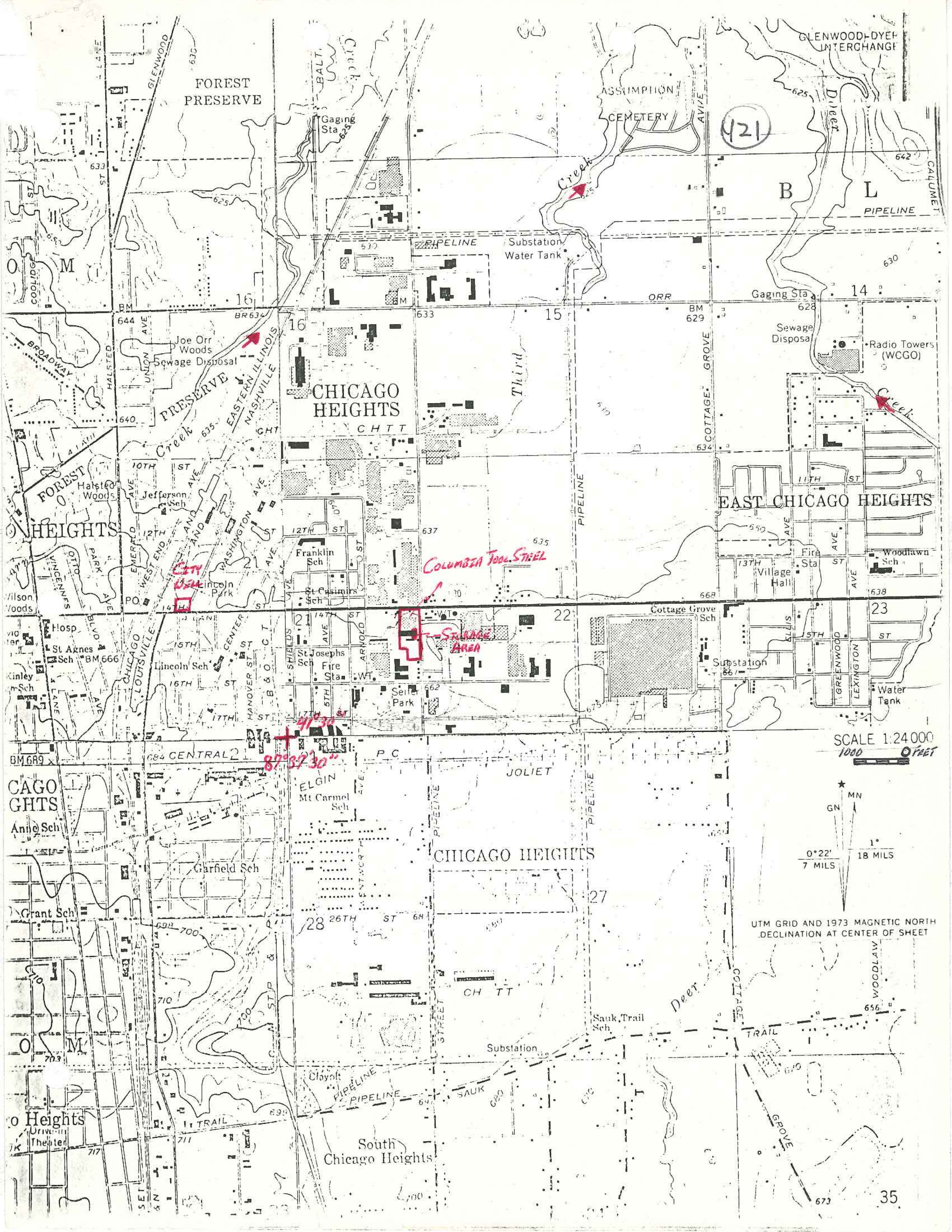
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*




421
FOREST PRESERVE
GLENWOOD-DYER INTERCHANGE
ASSUMPTION CEMETERY
Gaging Sta
Substation
Water Tank
PIPELINE
ORR
Sewage Disposal
Radio Towers (WCGO)
Joe Orr Woods Sewage Disposal
CHICAGO HEIGHTS
EAST CHICAGO HEIGHTS
Third Creek
Deer Creek
Halsted Woods
Jefferson Sch
Franklin Sch
St Casimirs Sch
Lincoln Park
CITY WELL
COLUMBIA TOOL STEEL
STORAGE AREA
Cottage Grove Sch
Village Hall
Fire Sta
Woodlawn Sch
St Josephs Sch
Seifer Park
Lincoln Sch
St Agnes Sch
Hosp
41°30'
87°37'30"
CENTRAL
JOLIET
ELGIN
Mt Carmel Sch
Garfield Sch
Grant Sch
Sauk Trail Sch
South Chicago Heights
SAUK TRAIL
SCALE 1:24 000
1000 0 FEET
GN
MN
0°22' 7 MILS
1° 18 MILS
UTM GRID AND 1973 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
35

MAIN OFFICE AND WORKS – CHICAGO HEIGHTS, IL 60411

C.2 Compliance/ Enforcement

ILLINOIS EPA
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153 791

312/345-9780

Refer to: 03104513 - Cook County - Chicago Heights/Columbia Tool Steel
ILD005144233

May 13, 1982

Mr. Bryan Boettger
Plant Manager
Columbia Tool Steel Company
400 E. Lincoln Highway
Chicago Heights, Illinois 60411

Dear Mr. Boettger:

On April 20, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.16, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. The owner/operator is deficient in that these were not available at the time of the inspection.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.

2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.

3) Records and results of waste analyses and trial tests.

4) Summary reports and details of all incidents that require implementation of the contingency plan.

5) Records and results of inspections.

6) Monitoring and testing data.

7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that an operating record was not maintained at the facility.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan on hand only listed the emergency coordinators and did not address the other requirements.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Bonnie Eleder of my staff at the above number.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BLE:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _ _ _ _ _ _ _ _
(11) (18)

_ _____ CO. - L.P.C. Region # _____ Date _ _/_ _/_ _
(20) (25)

_____/_____ Letter Sent (Yes or No) ___
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From _ _ : _ _ _ m Weather _____
Ground Water( ) Surface( ) Other( ) To _ _ : _ _ _ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ___ ___ ___
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( ) ___ (31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED I S or D ___ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

03104513
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD005144233
EPA IDENTIFICATION NUMBE

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Columbia Tool Steel Company

(B) Street: 400 E. Lincoln Hwy.

(C) City: Chicago Heights (D) State: IL (E) Zip Code: 60411

(F) Phone: 312-757-5353 (G) County: Cook

(H) Operator: Columbia Tool Steel Company

(I) Street: 400 E. Lincoln Hwy.

(J) City: Chicago Heights (K) State: IL (L) Zip Code 60411

(M) Phone: 312-757-5353 (N) County: Cook

(O) Owner: Columbia Tool Steel Company

(P) Street: 400 E. Lincoln Hwy.

(Q) City: Chicago Heights (R) State: IL (S) Zip Code: 60411

(T) Phone: 312-757-5353 (U) County: Cook

(V) Date of Inspection: 4-20-82 (W) Time of Inspection (From) 10:00 am (To) 11:30 a

(X) Weather Conditions: 52° sunny

(pg. 11-18, 21, 23 N/A)

Rev. 3-6-81/J.B.

	Person(s) Interviewed	Title	Telephone
(Y)	Bryan Boettger	Plant Engineer	312-757-5353

	Inspection Participants	Agency/Title	Telephone
(Z)	Bryan Boettger	Plant Engineer	312-757-5353
	Bonnie Eleder	IEPA/EPS	312-345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
Bonnie Eleder	IEPA/EPS	312-345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?			X	none
2. Facility expansion?			X	none
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
2. Artificial or natural barrier around facility?	X			fence
3. Controlled entry?	X			
4. Danger sign(s) at entrance?	X			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			
2. Records of operator error?	X			
3. Records of discharges?	X			

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	X			insp. done daily + week!
5. Safety, emergency equipment?	X			
6. Security devices?	X			guards keep log - do insp. on rounds - only indicate problems
7. Operating and structural devices?	X			
8. Inspection log?	X			daily production report weekly maintenance rep.
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?		X		nothing written - on the job training re handling of waste, safety, emergency procedures
4. Records of training?		X		
5. Have facility personnel received required training by 5-19-81?		X		
6. Do new personnel receive required training within six months?			X	none
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?			X	NA
2. No smoking signs?			X	NA
3. Separation and protection from ignition sources?			X	NA

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			
2. Telephone or 2-way radios at the scene of operations?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			dust collected in sealed roll-off box which is connected by tube to point of its generation

Indicate the volume of water and/or foam available for fire control: fire extinguishers

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
2. Is emergency equipment maintained in operable conditions?	X			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)		X		have a partial plan - only ID's emerg. coord.'s
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			by company nurse - written
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		X		E.C. identified, but only home phones given
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		X		
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)			X	not necessary

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		X		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	none

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?		X	
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		X	
c.	The location and quantity of each hazardous waste within the facility?		X	
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		NA	
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		X	
f.	Reports detailing all incidents that required implementation of the Contingency Plan?		X	none occurred
g.	All closure and post closure costs as applicable? (Effective 5-19-81)		X	

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator			X	
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?		X		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	NA			

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Columbia Tool Steel Co. Date of Inspection: 4-20-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			7 cu. yd. sealed boxes
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	NA			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			X	1 waste only
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			Δ	NA

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?				
4. Are inspection procedures followed according to 265.403?				
5. Are the special requirements fulfilled for ignitable or reactive wastes?				
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X			2 manifests Waste shipped out every 6 mo to 1 yr.
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X			
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X			

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	X			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
7.	Required certification?	X			
8.	Required signatures?	X			
(C)	Does the owner or operator submit exception reports when needed?			X	none needed

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)			X	transporter empties boxes directly into his truck, which is correctly placarded
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)			X	
(C)	If required, are placards available to transporters of hazardous waste?			X	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	NA			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The Columbia Tool Steel Company manufactures tool steel bar products and castings. One hazardous waste is generated - listed as K061 - emission control dust from the primary production of steel in electric furnaces, or, baghouse dust. Baghouse dust is hazardous in that it has a high chromium content.

The facility has four 7 cubic yard sealed boxes which are used to store the waste. Three are in use at one time, with the fourth held on the side. The boxes are connected by flexible tube directly to the point of waste generation (the furnaces). Once full, they are sealed off. The storage area is the same as the generation area. Shipping out the waste every 6 months to a year, the facility notified for storage status. The transporter hauls the waste off site in a truck. The boxes are emptied into the truck; the boxes do not leave the facility.

The inspection showed the facility to be in apparent non-compliance for the following:

lack of written training program (employees receive on the job training)
an incomplete Contingency Plan (only Emergency Coordinators were identified)
no Operating Record
no Closure Cost Estimate.

NR

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski
Date: September 23, 1992

Background Facility Information

Facility Name: Columbia Aluminum Recycling Ltd. (former Columbia Tool Steel Company)
EPA Identification No.: ILD 005 144 233
Location (City, State): Chicago Heights, IL
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility
1 SWMU

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
( ) Enforcement order
( ) Other (Explain)

There is no evidence of past corrective action.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway
(X) Not required

Additional explanatory notes:

There is no history of or potential for release at this facility.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

( ) Ground water
( ) Surface water
( ) Air
( ) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:
Surface water:
Air:
Soils:

(X) No
( ) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes (Go to 8a)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history of or potential for release at this facility.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history of or potential for release at this facility.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes (Go to 9)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history of or potential for release at this facility.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history of or potential for release at this facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

   ( ) Yes
   (X) No
   ( ) Uncertain

   Additional explanatory notes:

There is no history of or potential for release at this facility.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

    ( ) Yes
    (X) No
    ( ) Uncertain

    Additional explanatory notes:

There is no history of or potential for release at this facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

    ( ) Yes
    (X) No
    ( ) Uncertain

    Additional explanatory notes:

There is no history of or potential for release at this facility.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

    ( ) Solid
    ( ) Light non-aqueous phase liquids (LNAPLs)
    ( ) Dense non-aqueous phase liquids (DNAPLs)
    ( ) Dissolved in ground water or surface water
    ( ) Gaseous
    (X) Other None

13. Which of the following major chemical groupings are of concern at the facility?

    ( ) Volatile organic compounds (VOCs) and/or semi-volatiles
    ( ) Polynuclear aromatics (PAHs)
    ( ) Pesticides
    ( ) Polychlorinated biphenyls (PCBs) and/or dioxins
    ( ) Other organics
    (X) Inorganics and metals
    ( ) Explosives
    ( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

( ) Yes; Indicate possible course of action.

(X) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

There is no history of or potential for release at this facility.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
( ) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
(X) No, not required
( ) Further investigation necessary

Explain final decision, using additional sheets if necessary.

There is no history of or potential for release at this facility.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: COLUMBIA TOOL STEEL CO.

EPA I.D. NUMBER: ILD005144233

LOCATION CITY: 400 E. LINCOLN HWY.

STATE: CHICAGO HTS., IL. 60411

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N.A.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N.A.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N.A.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Typed Name and Title

William E. Hammer — Signature

2/7/86 — Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Jim Dillon
Vice-President
Columbia Aluminum Recycling, Ltd.
400 E. Lincoln Highway
Chicago Heights, Illinois 60411

Re: Visual Site Inspection
Columbia Aluminum Recycling, Ltd.
(Formerly Columbia Tool Steel Company)
Chicago Heights, Illinois
ILD 005 144 233

Dear Mr. Dillon:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

COLUMBIA ALUMINUM RECYCLING, LTD. (FORMERLY COLUMBIA TOOL STEEL COMPANY) CHICAGO HEIGHTS, ILLINOIS ILD 005 144 233

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 005 144 233
Date Prepared	:	February 10, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032-IL42
Prepared by	:	Resource Applications, Inc. (Catherine F. Tolley)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) at the Columbia Aluminum Recycling, Ltd. (Columbia Aluminum) facility in Chicago Heights, Illinois. No areas of concern (AOC) were identified at Columbia Aluminum. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified.

The Columbia Aluminum facility, a subsidiary of Metal Mark Inc., is an aluminum dross processor. The facility currently generates and manages the following waste streams: nonhazardous baghouse dust and nonhazardous slag. Columbia Aluminum has been in operation at its current location since 1991. The Columbia Aluminum facility occupies 8.45 acres in a commercial, industrial, and residential mixed-use area and employs 45 people. The facility is currently not regulated.

Columbia Aluminum acquired the facility in 1989 after the previous owner, Columbia Tool Steel Company (Columbia Tool), went out of business in 1987. Columbia Tool began manufacturing tool steel bar products and castings in 1973. In 1984, the Baghouse Dust Agglomerator (SWMU 1) was RCRA closed. In 1987, operations at the Columbia Tool facility were discontinued. Columbia Tool's original regulatory status was that of a small-quantity generator of hazardous waste, and a hazardous waste treatment, storage, or disposal (TSD) facility. In 1984 Columbia Tool's regulatory status changed to that of a small-quantity generator of hazardous waste when the Baghouse Dust Agglomerator (SWMU 1) was RCRA closed, delisting Columbia Tool as a TSD facility. During the time Columbia Tool was in operation, the facility had minor compliance problems which were satisfactorily resolved. SWMU 1 had no history of documented releases under Columbia Tool's tenure. Information on land use at the facility property prior to 1973 was not available.

The PA/VSI identified the following SWMU at the facility:

Solid Waste Management Unit

1. Baghouse Dust Agglomerator

The potential for release to ground water, surface water, air, and on-site soils is low. The current SWMU 1 has no history of releases and the nonhazardous dust is managed properly.

The facility is bordered on the north, east, and south by commercial and industrial businesses, and on the west by a railroad right-of-way and a light commercial and residential mixed area. The nearest school, St. Joseph's Elementary, is located about 0.75 mile west of the facility. Facility access is controlled by continuous 15-foot barbed-wire fencing, and a guard house located at the entrance gate.

The nearest surface water body, Third Creek, is located 0.5 mile northeast of the facility and is used for drainage purposes. Drinking water is obtained from the municipal water supply system which draws from Lake Michigan. Ground water is not used as a private water supply. There are no drinking water wells in the vicinity of the facility.

Sensitive environments are located in the immediate vicinity of the facility. The facility is surrounded by municipal forest preserves approximately 1.5 miles to the north, west, and southwest.

RAI recommends no further action for the facility at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Columbia Aluminum Recycling, Ltd. (Columbia Aluminum) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Columbia Aluminum facility (formerly Columbia Tool Steel Company, EPA Identification No. ILD 005 144 233) in Chicago Heights, Cook County, Illinois. The PA was completed on June 12, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed publications from the National Oceanic and Atmospheric Administration (NOAA), Illinois State Geological Survey (ISGS), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), Federal Emergency Management Agency (FEMA), Illinois Department of Commerce and Community Affairs, Illinois State Water Survey Division, and the U.S. Geological Survey (USGS). The VSI was conducted on June 15, 1992. It included interviews with a facility representative and a walk-through inspection of the facility. RAI identified one SWMU and no AOCs at the facility.

The VSI is summarized and one inspection photograph is included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history, environmental setting; and receptors.

2.1 FACILITY LOCATION

The Columbia Aluminum facility is located at 400 E. Lincoln Highway in Chicago Heights, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°30"22' N and longitude 87°36"58' W). The facility occupies 8.45 acres in a mixed-use area.

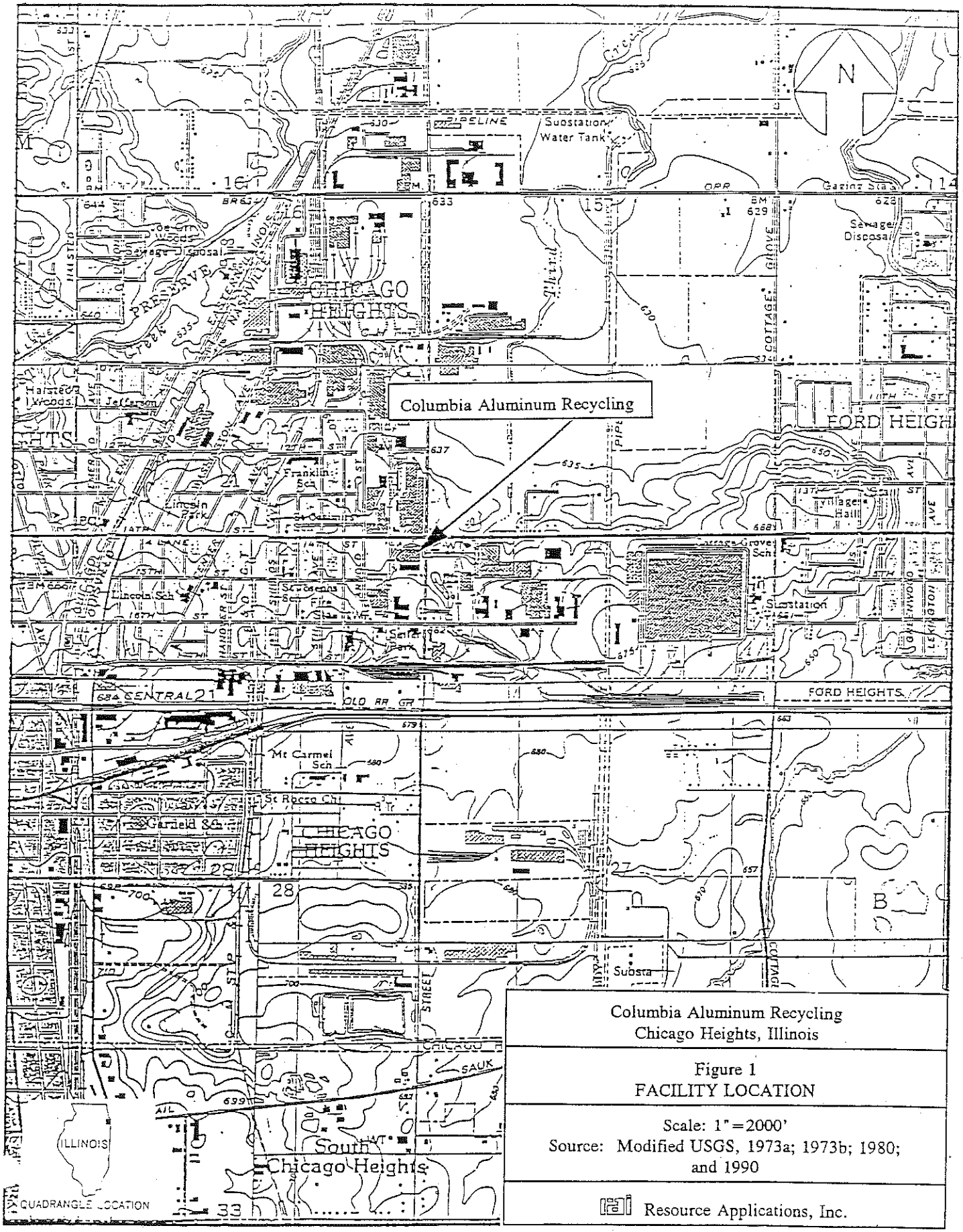
The facility is bordered on the north, east, and south by commercial and industrial businesses, and on the west by a railroad right-of-way and a light commercial and residential mixed area.

2.2 FACILITY OPERATIONS

Columbia Aluminum currently operates as an aluminum dross processing facility. Aluminum is reclaimed primarily from skimmings and large reverberation operations, as well as from aluminum die casting operations. No hazardous wastes and two nonhazardous wastes, baghouse dust and slag, are generated at the facility and are transported to landfills for disposal. The baghouse dust is disposed of two to three times per week, and the slag is disposed of daily.

Solid wastes generated from facility operations and the SWMU where they are managed are discussed in detail in Section 2.3.

Columbia Aluminum has operated the facility since 1991 and employs 45 people working in a three-shift schedule, 24 hours per day. The 8.45-acre site consists of buildings taken over from Columbia Tool Steel Company (Columbia Tool). The 50,000-square-foot main building houses the plant manager's office and two operational furnaces. Other buildings totalling approximately 45,000



Columbia Aluminum Recycling Chicago Heights, Illinois
Figure 1 FACILITY LOCATION
Scale: 1"=2000' Source: Modified USGS, 1973a; 1973b; 1980; and 1990
Resource Applications, Inc.

square feet are used for storage and other offices. A parking lot is located at the guardhouse entrance in the southwest section of the site.

Operations at the site began in 1973 under Columbia Tool, a tool steel bar products and castings manufacturer. Columbia Tool generated a hazardous, high-chromium content baghouse dust (K061) from the production of steel in electric furnaces. The hazardous dust was stored in 7- to 10-cubic-yard roll-off boxes for greater than 90 days. In 1987, Columbia Tool declared bankruptcy. The site was purchased by Metal Mark, Inc. and its subsidiary, Columbia Aluminum, began operations in 1991. No information on land use prior to 1973 at the site was available.

2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated since 1991 at the Columbia Aluminum facility include nonhazardous baghouse dust and nonhazardous slag. Both the baghouse dust and slag are generated in the main building during the smelting process. The baghouse dust is managed in the Baghouse Dust Agglomerator (SWMU 1) and is blown directly into covered 7- to 10-cubic-yard roll-off boxes through flexible tubing, preventing handling and release of the waste. The baghouse dust is picked up two to three times a week by Sexton Contractors of Chicago Heights, Illinois, and transported to CID Landfill in Calumet City, Illinois. The slag is picked up once a day (or more frequently) at the point of generation, adjacent to the smelting furnaces, by P&H Trucking of South Holland, Illinois, and transported to Land and Lakes landfill of Chicago, Illinois (Columbia Aluminum, 1992b).

The facility was inactive from 1987 to 1991. From 1973 to 1987 the site was occupied by Columbia Tool. Columbia Tool generated a hazardous, high-chromium content baghouse dust (K061) during steel production in electric furnaces. Columbia Tool used the same Baghouse Dust Agglomerator (SWMU 1) that is currently operating at Columbia Aluminum. In 1984, in order to delist Columbia Tool as a hazardous waste storage facility, the Baghouse Dust Agglomerator (SWMU 1) was RCRA closed. The hazardous baghouse dust was no longer stored on site for more than 90 days. Columbia Tool's hazardous baghouse dust was managed in a similar manner as the current nonhazardous dust, with the exception that the hazardous baghouse dust was disposed of less frequently. Browning Ferris Industries transported the hazardous baghouse dust to a landfill in Zion, Illinois until Columbia Tool was permanently shut down.

Columbia Tool's and Columbia Aluminum's SWMU is identified in Table 1. Columbia Aluminum's layout, including the SWMU location, is shown in Figure 2. Columbia Tool's and Columbia Aluminum's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, or on-site soils at this facility.

2.5 REGULATORY HISTORY

Columbia Tool submitted a Notification of Hazardous Waste Activity form to EPA on August 13, 1980 (Columbia Tool, 1980a). The facility submitted a RCRA Part A permit application on November 11, 1980 as a small-quantity generator and treatment, storage, or disposal (TSD) facility (Columbia Tool, 1980b). This application listed the following process code and capacity: S01 (5,858 gallons). The application listed the following waste: K061, with an estimated annual generation rate of 42 tons. The S01 code refers to the Baghouse Dust Agglomerator, SWMU 1, which was RCRA closed in 1984. A closure plan submitted to IEPA by Columbia Tool on April 3, 1984 was rejected on May 11, 1984 (IEPA, 1984a). The revised closure plan submitted on June 21, 1984 was approved on August 23, 1984 (IEPA, 1984b). On April 3, 1985, IEPA acknowledged receipt of closure certification and approved the closure (IEPA, 1985). Columbia Tool was then classified as a small-quantity generator of hazardous waste only. Minor RCRA compliance problems were observed at Columbia Tool during three inspections conducted by IEPA in 1982, 1986, and 1987 pertaining to the closure plan for the facility, contingency plan and training records (IEPA, 1982; 1986; 1987). All violations were resolved satisfactorily and no orders were issued.

Columbia Aluminum is not a regulated facility. The facility possesses three permits: an IEPA construction permit for modifications to SWMU 1 (permit No. 91060105), issued September 17, 1991 (IEPA, 1991a); a Cook County Department of Environmental Control (CCDEC) permit for SWMU 1 (permit No. 77829), issued December 4, 1991 (CCDEC, 1991); and an IEPA operating air permit for SWMU 1 and the furnaces (permit No. 89090068) issued November 4, 1991 which expires November 28, 1994 (IEPA, 1991b).

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Baghouse Dust Agglomerator	Yes	RCRA closed in 1984, shutdown from 1987 to 1991, restarted in 1991 and is currently used for nonhazardous waste which is stored for less than 90 days.

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

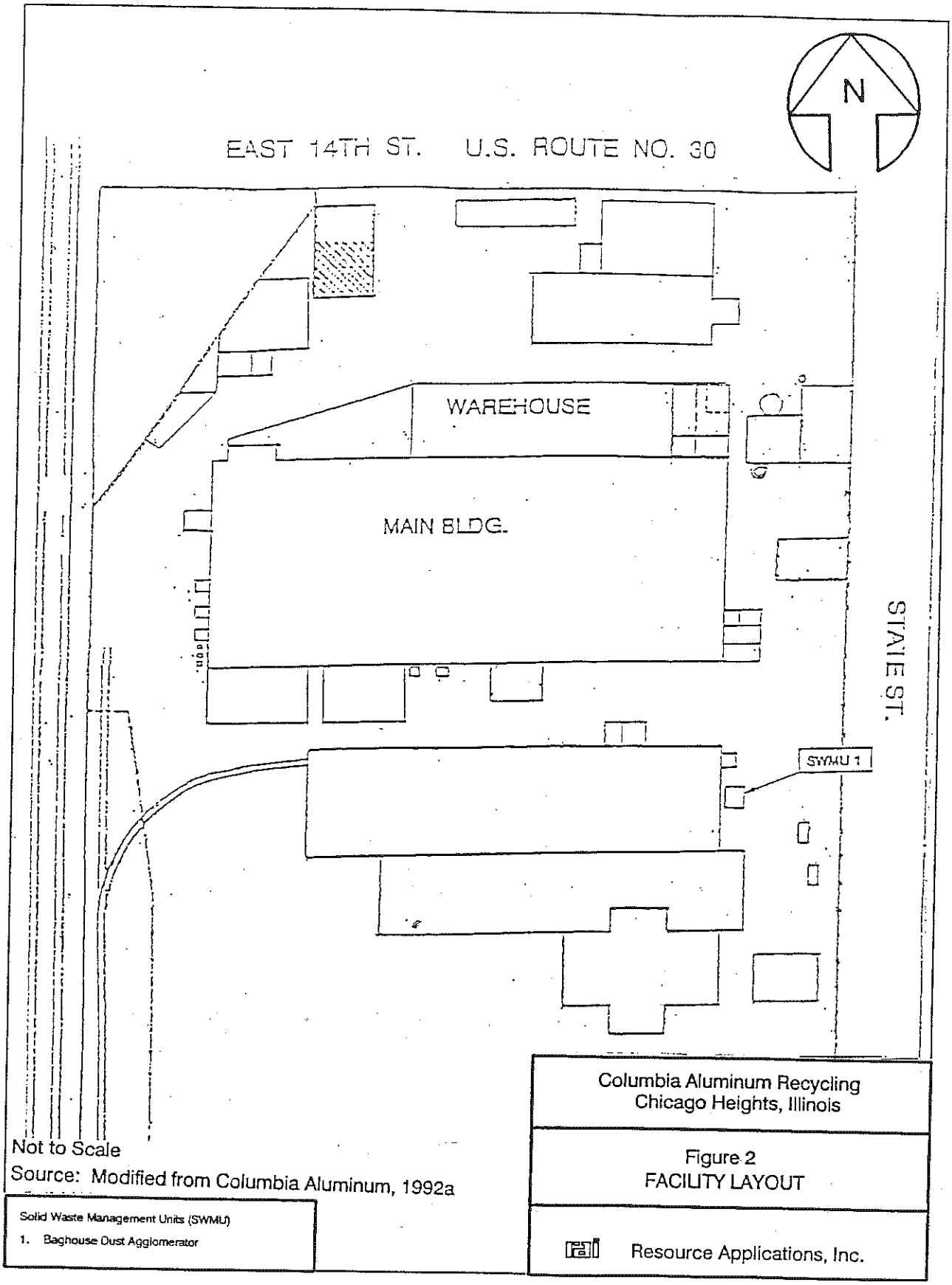

N
EAST 14TH ST.
U.S. ROUTE NO. 30
WAREHOUSE
MAIN BLDG.
STATE ST.
SWMU 1
Not to Scale
Source: Modified from Columbia Aluminum, 1992a
Solid Waste Management Units (SWMU)
1. Baghouse Dust Agglomerator
Columbia Aluminum Recycling
Chicago Heights, Illinois
Figure 2
FACILITY LAYOUT
Resource Applications, Inc.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Columbia Aluminum Baghouse Dust/NA	Recycling furnaces	SWMU 1
Columbia Aluminum Slag/NA	Recycling furnaces	Removed directly from main building to off-site landfill
Columbia Tool Baghouse Dust/K061	Electric furnaces	SWMU 1

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

There have been no recorded permit violations, no odor complaints from area residents, and the facility is not required to have a National Pollutant Discharge Elimination System permit. No CERCLA activity has been performed at this facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Cook County is predominantly continental with frequent short period fluctuations in temperature, humidity, cloudiness, and wind direction (Ruffner, 1985). The average daily temperature is 51.4 degrees Fahrenheit (°F). The lowest average daily temperature is 20.3°F in January. The highest average daily temperature is 81.0°F in July (NOAA, 1990).

The total annual precipitation for the county is 33.34 inches. The mean annual lake evaporation for the area is about 30 inches. The 1-year, 24-hour maximum rainfall is 6.24 inches (NOAA, 1990).

The prevailing wind is west-southwest. Average wind speed is highest in April at 12 miles per hour (NOAA, 1990).

The continental weather of Cook County is partially modified by Lake Michigan. During the warm season there is frequently a cool lake breeze which reduces daytime temperatures near the shore by up to 10 degrees. In late autumn and winter, cold air masses reaching land are tempered by passage over the lake (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

For flood classification purposes the facility is located in Zone C, outside the 500-year flood plain (FEMA, 1979).

The nearest surface water body, Third Creek, is located about 0.5 mile northeast of the facility and is used for drainage purposes. Third Creek merges with Thorn Creek approximately 2 miles north of the facility. About 8 miles north, Thorn Creek joins the Little Calumet River which empties into Lake Michigan.

All building and site runoff on the level site is directed by surface drains and an under-building drainage system to the Thorn Creek Basin Sanitary Sewer District line, adjacent to the property.

2.6.3 Geology and Soils

No site-specific information was available, thus, regional geological information is presented here. Soils in the Chicago vicinity have developed through the weathering of underlying glacial deposits over the past 13,500 years. The Columbia Aluminum facility exists in an area underlain by approximately 100 feet of glacial drift (Bergstrom and Piskin, 1975). The glacial deposits in the area are mainly till, which consists of pebbles, cobbles, and other coarse rock fragments set in a clay or silt matrix. Within the till are small lenses of outwash deposits, which are sands and gravels deposited by meltwater streams (Lineback and Willman, 1970).

The uppermost bedrock beneath the facility is dolomite and limestone of Silurian age, part of the Niagaran-Alexandrian series. These units are approximately 400 feet thick, and are underlain by 300 feet of Ordovician Maquoka gray-brown shale which contains some thin layers of limestone and dolomite. Galena-Platteville dolomite and limestone underlies the Maquoketa shale, and is about 200 feet thick. Beneath these rocks lie, with increasing depth, the Glenwood-St. Peter sandstones (about 100 feet thick), the Prairie du Chien, Trempeleau, and Franconia sandy dolomites (which straddle the Cambrian-Ordovician boundary and are about 400 feet thick), and the deepest significant aquifer, the Ironton-Galesville sandstone (about 175 feet thick). Beneath these deposits are the Eau Claire and Mount Simon shales, siltstones, and sandstones underlain by Precambrian basement (Suter, et al., 1959).

2.6.4 Ground Water

Ground water in northeast Illinois exists in four major aquifer systems. The systems are, in order of descending depth: the glacial drift system, the shallow bedrock system, the Cambrian-Ordovician system, and the Mt. Simon system (Willman, 1971).

In the shallow unconsolidated deposits of the glacial drift system, lateral flow is generally dependent on the local topography which has been modified by urban development. Ground water flow is generally towards the nearest surface water body (Cravens and Zahr, 1990). Near Columbia Aluminum, the ground water flows northeast.

The shallow bedrock system consists mainly of Silurian dolomite. Movement within the Silurian dolomite occurs in joints, fissures, solution cavities, and bedding plane openings. Regional ground water movement within the Silurian system of northeastern Illinois tends to be from the northwest towards the southeast (Cravens and Zahr, 1990).

The deep bed aquifer systems, comprised mainly of sandstones and dolomites, include the Cambrian-Ordovician and Mt. Simon aquifer systems. The major aquifers in the deep systems are the Glenwood-St. Peter, Ironton-Galesville (both part of the Cambrian-Ordovician system), and Mt. Simon Sandstones (Hughes, et al., 1966). Recharge to the Cambrian-Ordovician system occurs in areas of outcrop, shallow cover by glacial drift, and from leakage downward through the shallow bedrock system. Recharge to the Mt. Simon aquifer occurs from an outcrop region located in central southern Wisconsin (Willman, 1971).

The communities surrounding Columbia Aluminum receive their water supply from Lake Michigan. No information was available on industrial ground water wells.

2.7 RECEPTORS

The facility occupies 8.45 acres in a mixed-use area in Chicago Heights, Illinois. Chicago Heights has a population of about 33,000 (Illinois Department of Commerce and Community Affairs (IDCCA), 1991).

The facility is bordered on the north, east, and south by commercial and industrial businesses, and on the west by a railroad right-of-way and a light commercial and residential mixed area. The nearest school, St. Joseph's Elementary, is located about 0.75 mile west of the facility.

Facility access is controlled by continuous 15-foot barbed-wire fencing, and a guard house located at the entrance gate.

The nearest surface water body, Third Creek, is located 0.5 mile northeast of the facility and is used for drainage purposes. Drinking water is obtained from the municipal water supply system which draws from Lake Michigan (IDCCA, 1991).

Ground water is not used as a private water supply. There are no drinking water wells in the vicinity of the facility.

Sensitive environments are located within the vicinity of the facility. The facility is surrounded by municipal forest preserves approximately 1.5 miles to the north, west, and southwest.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the one SWMU identified during the PA/VSI. The following information is presented for the SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU location.

SWMU 1	**Baghouse Dust Agglomerator**
Unit Description:	The Baghouse Dust Agglomerator is located outdoors on the east side of the former melt shop building. The metal unit is a Wheelabrator 4 module, negative pressure, two compartment bag type dust collector. The theoretical capacity of 130,000 cubic feet per minute (cfm) is accomplished by twin 65,000 cfm blowers (see Photograph No. 1).
Date of Startup:	This unit began operation under Columbia Tool on December 31, 1973. From 1987 to 1991 the facility was inactive. The unit began operation again in 1991 under Columbia Aluminum.
Date of Closure:	The unit was RCRA closed in 1984, and shutdown in 1987. In 1991 the unit was started under Columbia Aluminum. The unit is currently active.
Wastes Managed:	This unit currently manages a nonhazardous dust. It formerly managed a hazardous dust (K061) from 1973 to 1987.
Release Controls:	The dust is blown directly into covered storage containers through flexible tubing, preventing human contact and release to the environment.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	One 7- to 10-cubic-yard roll-off box was full, and another was being filled during the VSI. RAI noted no evidence of release.

4.0 AREAS OF CONCERN

No AOCs were identified during the PA/VSI, and there is no history of documented releases at this facility.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified one SWMU and no AOCs at the Columbia Aluminum facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are RAI's conclusions and recommendations for the SWMU. Table 3, at the end of this section, summarizes the SWMU at the facility and the recommended further actions.

SWMU 1 **Baghouse Dust Agglomerator**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low. The unit, currently operated by Columbia Aluminum, manages a nonhazardous waste which is blown directly into covered storage containers and emptied two to three times per week. From 1987 to 1991 the unit did not operate. From 1973 to 1987, the facility was operated by Columbia Tool and the unit managed a hazardous, high-chromium content dust (K061). No history of releases exists for the life of this unit.

Recommendations: RAI recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Baghouse Dust Agglomerator	1973 to 1987; 1991 to present	None	None

REFERENCES

Bergstrom, R.E. and K. Piskin, 1975. Glacial Drift in Illinois: Thickness and Character, Illinois State Geological Survey (ISGS) Circular 490.

Columbia Aluminum Recycling, Ltd. (Columbia Aluminum), 1992a. Facility map, Figure 2, FAX from Jim Dillon, June 23.

Columbia Aluminum, 1992b. Telephone conversation between Catherine Tolley and Columbia Aluminum administrative employee, July 13.

Columbia Tool Steel Company (Columbia Tool), 1980a. Notification of Hazardous Waste Activity, August 13.

Columbia Tool, 1980b. RCRA Part A permit application, November 11.

Cook County Department of Environmental Control (CCDEC), 1991. Columbia Aluminum installation permit, December 4.

Cravens, S.J. and A.L. Zahr, 1990. Ground-Water Quality Investigation and Monitoring Program Design for the Lake Calumet Area of Southeast Chicago, Illinois State Water Survey Division, SWS Contract Report 496.

Federal Emergency Management Agency (FEMA), 1979. National Flood Insurance Program-Flood Rate Insurance Map: City of Chicago Heights, Cook County, Illinois, Community-panel number 170075 0005 B, November 15.

Hughes, G.M., P. Kratz, R.A. Landon, 1966. Bedrock Aquifers of Northeastern Illinois, ISGS Circular 406.

Illinois Department of Commerce and Community Affairs (IDCCA), 1991. Community Profile for Chicago Heights, Cook County, Illinois.

Illinois Environmental Protection Agency (IEPA), 1982. Columbia Tool inspection report, April 20.

IEPA, 1984a. Letter to Bryan L. Boettger, Columbia Tool, notifying rejection of closure plan, May 11.

IEPA, 1984b. Letter to Bryan L. Boettger, Columbia Tool, notifying acceptance of revised closure plan, August 23.

IEPA, 1985. Letter to Bryan L. Boettger, Columbia Tool, acknowledging receipt of closure certification, April 3.

IEPA, 1986. Columbia Tool inspection report, November 25.

IEPA, 1987. Columbia Tool inspection report, March 11.

IEPA, 1991a. Columbia Aluminum construction permit, September 17.

IEPA, 1991b. Columbia Aluminum operating permit, November 4.

Lineback, J.A. and H.B. Willman, 1970. Map of the Surficial Geology of the Chicago Region, ISGS.

National Oceanic and Atmospheric Administration (NOAA), 1990. Local Climatological Data, Chicago, Illinois, ISSN 0198-1846.

Ruffner, J.A., 1985. Climates of the States, Vol.1, Gale Research Company, Detroit, Michigan.

Suter, M., R.E. Bergstrom, H.F. Smith, G.H. Emrich, W.C. Walton, and T.E. Larson, 1959. Summary Preliminary Report on Ground-Water Resources of the Chicago Region, Illinois. ISGS Cooperative Ground-Water Report 1-S.

U.S. Geological Survey (USGS), 1973a. 7.5-minute topographic series: Harvey quadrangle.

USGS, 1973b. 7.5-minute topographic series: Steger quadrangle.

USGS, 1980. 7.5-minute topographic series: Calumet City quadrangle.

USGS, 1990. 7.5-minute topographic series: Dyer quadrangle.

Willman, H.B., 1971. Summary of the Geology of the Chicago Area, ISGS Circular 460.

ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Columbia Aluminum Recycling, Ltd.
400 E. Lincoln Hwy.
Chicago Heights, Illinois 60411
ILD 005 144 233

Date:	June 15, 1992
Primary Facility Representative:	Jim Dillon, Columbia Aluminum Recycling Ltd., Vice-President
Representative Telephone No.:	(708) 758-8888
Additional Facility Representatives:	Larry Lipa, Plant Manager
Inspection Team:	Catherine F. Tolley, Resource Applications, Inc. (RAI) Laura Czajkowski, RAI
Photographer:	C. Tolley, RAI
Weather Conditions:	Partly sunny, temperature about 68°F
Summary of Activities:	The visual site inspection (VSI) began at 8:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The facility representative then discussed the facility's current operations, solid wastes generated, and release history. The facility representative provided the inspection team with copies of requested documents. However, the representative could provide no information about past operations at the facility. The VSI tour began at 9:30 a.m., and consisted of viewing the Baghouse Dust Agglomerator (SWMU 1), walking through the main building, and briefly touring the remainder of the facility. SWMU 1, located outside on flat ground on the east side of the former melt shop building, was in operation. A photoionization detector (PID) was used during the VSI and found no detectable volatile hydrocarbons. The tour concluded at 11:00 a.m., after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at noon.

Photograph No. 1
Orientation: North
Description: Baghouse Dust Agglomerator

Location: SWMU 1
Date: June 15, 1992

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

COLUMBIA ALUMINUM RECYCLING, LTD - VSI JUNE 15, 1992

Arrive at site, check in 8:00 AM
at guard house proceed to Larry Lopes office
Meet w/ L.L and Jim Dillon - VP
WEATHER: Partly sunny, 65°

- Provided with flow/process diagram and three permits - construction, operating, air county

- 45 employees, work in 3 shifts.
plant operates 24 hrs a day

- when CTSC went into bankruptcy Metal Maker took over - wanted the baghouse

- began process in late 1990 early 1991

- have 4 furnaces, only 2 are operational now in Main building - dark, kind of hollowed out warehouse, 2 furnaces large (look like cement truck mixers), aluminum comes out and is poured into [sketch] 1000 lb blocks.

6-15-92
CFT

COLUMBIA ALUMINUM RECYCLING LTD
VSI – 6-15-92

- wastes generated by smelting aluminum dross – slag and dust

- slag: grey musky looking ~~[illegible]~~ sand CFT

- dust goes out to Baghouse

- slag is transported away everyday by P+H trucking Co.

- when material is fed into furnace and melted, alum. + slag ↑ ⇒ 1000 lbs (bullets)

- moving outside main building around to see baghouse

- there are two 7-ncal- yard boxes – one is full the other is attached and in use.

- Baghouse is on level, gravelly ground

- site is level → flat basically

6-15-92
CFT

COLUMBIA ALUMINUM VSI
6-15-92

- more questions
- site 8.45 acres, mixed use area

- north, east, south - com, indust businesses
- west - railroad right, light com & res. mixed

- dross processing facility, reclaims al. from proc. skimmings and slag from large smelt. operations as well as residue from al. die caster op's → end product 1000 lb RSI

- all mat's ~~stored~~ inside always

- non-haz. wastes transported off-site to landfill everyday

- environmental audit performed by Charles Licht Eng. - 88/89

- site flat basically, excavations have been made to make flat

6-15-92
CFT

COLUMBIA ALUMINUM RECYCLING
VSI - 6/15/92

- Water drains to under building drainage system to Thorn Creek Basin sanitary sewer district line next to property.

- Baghouse: wheelabrator 4 mod., neg. pressure, two comp. bag type dust collector, 130,000 cfm this cap. by (2) 65,000 cfm blowers.

- Baghouse was owned by CASC - they don't know how long it was in service - have no info on operation while owned by CASC.

6-15-92
CFT